

## **REMARKS**

### Entry of Amendment

Applicants are filing a RCE herewith. Accordingly, this amendment should be entered and considered at this time.

Applicants are also canceling pending Claims 1-13 and adding new Claims 19-28. It is respectfully requested that these new claims be entered and allowed. No fee is believed due for these new claims. If a fee should be due for these new claims, please charge our deposit account 50/1039.

### Claim Rejections - 35 USC §112

In the Final Rejection, the Examiner has a number of rejections of the claims under 35 USC §112, first and second paragraphs. These rejections are respectfully traversed.

While Applicants traverse these rejections, in order to advance the prosecution of this application, Applicants are canceling pending Claims 1-13 and adding new Claims 19-28. It is respectfully submitted that the new claims overcome each of the Examiner's §112 objections to the claims. Accordingly, it is respectfully requested that the §112 rejections, first and second paragraphs, be withdrawn.

### Claim Rejections - 35 USC §102

The Examiner also rejects Claims 1, 2, 6(1,2), 11(1,2) and 13(1,2) under 35 USC §102(b) as being anticipated by Gill, Jr. (US 5,144,711). This rejection is also respectfully traversed.

Gill, Jr. is directed to a cleaning apparatus in which the scrub pads and a wafer or substrate all rotate respectively to scrub-clean the substrate. In the cleaning apparatus in Gill, Jr., each rotation shaft (axis) of the scrub pads and the substrate is fixed.

In contrast, while Applicants traverse this rejection, in order to advance the prosecution of this application, new claims are being added. Accordingly, the claimed invention is directed to a scrub cleaning device having the following features:

- (a) A pair of scrubbers (the pair of scrubbers perform the scrub cleaning of the substrate as well as conveying the substrate); and
- (b) Sub cleaning (for example, the claims recite a subsidiary scrub cleaning of the substrate; this is performed while conveying the substrate with the rotation axis of the substrate not fixed), as well as main cleaning (for example, the claims recite a scrub cleaning of the substrate performed with the substrate stopped and the rotation axis of the substrate fixed) is performed.

Further, in his Response to Arguments in the Final Rejection, the Examiner agrees with Applicant that in the apparatus of the present application, the axis is not fixed. As previously pointed out, the rotation shaft (axis) of the scrub pads in Gill, Jr. is fixed.

Therefore, it is respectfully submitted that Gill, Jr. does not disclose or suggest the claimed invention or a device capable of performing these features of the claimed invention, and the claims are patentable thereover. Accordingly, it is respectfully requested that this rejection be withdrawn.

Claim Rejections - 35 USC §103

The Examiner also rejects Claims 3-5, 6(3,4), 7-10, 11(3,4), 12 and 13(3,4) under 35 USC §103(a) as being unpatentable over Gill, Jr. This rejection is also respectfully traversed.

Similar to above, these claims have been cancelled and replaced with new Claims 21-28. For reasons similar to those explained above, these dependent claims are also not disclosed or suggested by Gill, Jr. Accordingly, it is respectfully requested that this rejection be withdrawn.

Conclusion

Therefore, it is respectfully submitted that the present application is now in a condition for allowance and should be allowed.

If any additional fee is due for this Amendment or the submissions herewith, please charge our deposit account 50/1039.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

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